

MODULE II - GENERAL FACILITY STANDARDS AND POST-CLOSURE CARE

II.A POST-CLOSURE CARE OF HWI

- II.A.1 USS shall maintain and monitor the HWI throughout the Post-Closure Care Period in accordance with this Permit and with the provisions of R315-8-7 as in effect on May 14, 2004.
- II.A.2 Monitoring by USS shall ensure detection of a release of hazardous waste, hazardous waste constituents, leachate, contaminated runoff or hazardous waste decomposition products to the soil, groundwater, or surface water from the CHWI. USS shall maintain all containment and monitoring equipment throughout the Post-Closure Care Period in accordance with this Permit.
- II.A.3 USS shall maintain the groundwater interception trench in accordance with the procedures contained in Attachment 2 of this Permit.
- II.A.4 The CHWI were certified as closed on July 29, 1991. The Post-Closure Care Period began on July 29, 1991 and shall continue for a minimum of 30 years after that date.
- II.A.5 Certification of Completion of Post-Closure Care. USS shall certify that the post-closure care was performed in accordance with the specifications in the Post-Closure Plan, as required by R315-8-7.

II.B POST-CLOSURE MAINTENANCE

- II.B.1 USS shall:
- II.B.1.a Maintain the integrity and effectiveness of the final cover in accordance with this Permit, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events.
- II.B.1.b Prevent run-on and run-off from eroding or otherwise damaging the final cover in accordance with R315-8-11.5(b)(4).
- II.B.1.c Inform Geneva and the Executive Secretary upon discovery of any post-closure use of the property which will disturb the integrity of the final cover, containment systems, or monitoring system in accordance with Attachment 2 and R315-8-11.5(b)(1).
- II.B.1.d Protect and maintain survey benchmarks used in complying with R315-8-14.4.

II.C SECURITY

II.C.1 USS shall comply with the following security conditions:

II.C.1.a USS shall provide a fence with locking gates surrounding the CHWI, to prevent unauthorized entry and shall maintain such fence throughout the post-closure care period.

II.C.1.b USS shall post signs which read "DANGER, UNAUTHORIZED PERSONNEL KEEP OUT" at the entrance gate and every 300 feet along the fence and shall maintain such signs throughout the post-closure care period. The signs must be legible from a distance of at least 25 feet in compliance with R315-8-2.5(c). All security equipment shall be inspected throughout the post-closure care period in accordance with Attachment 2.

II.C.1.c USS shall note all damaged security equipment in the inspection checklist and shall complete repairs as soon as practicable.

II.D GENERAL INSPECTION REQUIREMENTS

II.D.1 USS shall follow the inspection schedule found in Attachment 2.

II.D.2 USS shall remedy any deterioration or malfunction in accordance with Attachment 2 and R315-8-2.6(c).

II.D.3 USS shall keep records of inspections as required by Attachment 2.

II.D.4 USS may make revisions to the Inspection Procedures in Attachment 2 of this permit in accordance with the procedures for permit modifications of R315-3-4.3.

II.E PERSONNEL TRAINING

II.E.1 USS shall conduct personnel training as required by R315-8-2.7. New personnel working at the HWI shall complete the required personnel training on or within six months after their hire date or assignment to the HWI. In addition, USS shall comply with the following conditions:

II.E.1.a HWI personnel shall receive an annual review of their initial training in both contingency procedures and the hazardous waste management procedures relevant to the work at the HWI.

II.E.1.b USS shall maintain training documents and records as required by R315-8-2.7(d) and R315-8-2.7(e).

- II.E.1.c USS shall maintain a copy of the training plan at Geneva Steel until completion of the post-closure care period.

II.F CONTINGENCY PLAN

- II.F.1 When dictated by the Contingency Plan for the HWI, USS, or such other individuals or entities designated in the contingency plan, shall immediately carry out the emergency procedures described by R315-8-4.7. USS shall comply with R315-9 in reporting releases from the HWI to the Executive Secretary.

- II.F.2 USS shall maintain a copy of the Contingency Plan for the HWI at Geneva Steel.

- II.F.3 USS shall review and amend, if necessary, the Contingency Plan for the HWI in accordance with R315-8-4.5.

II.G RECORDKEEPING AND REPORTING

- II.G.1 USS shall submit reports as required to the Executive Secretary documenting post-closure groundwater monitoring activities and results from analyses of samples collected in compliance with post-closure monitoring requirements. Copies of all appropriate records will be maintained at Geneva Steel.

II.H FINANCIAL ASSURANCE FOR FACILITY POST-CLOSURE CARE

- II.H.1 USS shall maintain continuous compliance with the financial assurance requirements of R315-8-8.

II.I COST ESTIMATES FOR POST-CLOSURE CARE

- II.I.1 USS shall maintain continuous compliance with cost estimate requirements of R315-8-8.

II.J LIABILITY REQUIREMENTS

- II.J.1 USS shall maintain continuous compliance with R315-8-8, including documentation requirements, and liability coverage for sudden accidental occurrences in the amount of at least one million U.S. dollars per occurrence with an annual aggregate of at least two million U.S. dollars, exclusive of legal defense costs for the Post-Closure Care Period.

- II.J.2 USS shall maintain continuous coverage for non-sudden accidental occurrences in the amount of at least three million U.S. dollars per occurrence, with an annual aggregate of at least six million U.S. dollars, exclusive of legal defense costs, for the HWI.

**II.K INCAPACITY OF OWNER OR OPERATORS, GUARANTORS, OR
FINANCIAL INSTITUTIONS**

II.K.1 USS shall comply with R315-8-8.

II.L POST-CLOSURE GROUNDWATER MONITORING

II.L.1 USS shall maintain and monitor the HWI. Within 60 calendar days of Permit issuance, USS shall submit maintenance procedures for the interceptor trench which shall be included in Attachment 2.

II.L.2 USS shall maintain a groundwater monitoring system as specified in Condition II.L.3 and in accordance with R315-8-6.8.

II.L.3 USS shall maintain and monitor the groundwater monitoring systems in compliance with Module III. Monitoring wells in the systems are those identified in Module III. During the Post-Closure Care period, water level measurements at the monitor wells shall be conducted in accordance with this Permit. USS shall maintain groundwater monitoring wells specified in Module III, at the locations specified on the facility maps in Attachment 3. USS may add or delete wells as specified in this Permit.